MSV
Mobile Satellite Ventures LP

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DOCKET FILE COPY ORIGINAL

December 1, 2005

Via Hand Delivery and Electronic Filing
Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: File No. SAT-PPL-20050926-00184
IB Docket No. 05-220
IB Docket No. 05-221

Dear Ms. Dortch:

Mobile Satellite Ventures Subsidiary LLC ("MSV") hereby responds to Inmarsat's most recent letter in the above-referenced docket claiming that the L band is not suitable for broadband services.[1] As MSV has demonstrated previously, and Inmarsat again fails to rebut, Inmarsat's true motivation for criticizing the utility of the L band seems to be based on the realization that its new L band satellites lack the power to provide acceptable service to small handheld user equipment. This issue prevents Inmarsat from developing and deploying a commercially viable hybrid satellite/terrestrial network. Inmarsat's November 16th letter never even claims, let alone demonstrates, that it will be able to provide such "transparency class" service to handheld terminals. Inmarsat's letter also fails to explain why its self-styled "application" for a 2 GHz system shows satellites with five times the power of its new L band satellites, leaving unchallenged MSV's assertion that this is further evidence that Inmarsat recognizes its L band satellites are essentially useless for hybrid service.

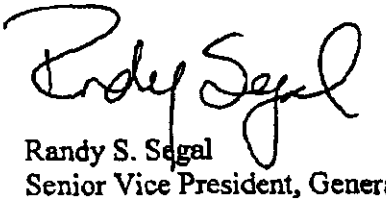
Inmarsat also fails to respond to MSV's showing that Inmarsat's L band operations are spectrum inefficient and that Inmarsat is trying to rely on this spectrum inefficiency as an excuse to forestall competition in the L band. While Inmarsat claims that the new satellites are an order of magnitude more spectrum efficient that its previous spacecraft, this ignores the gap that remains between Inmarsat's new satellites and state of the art satellites such as MSV-1. Inmarsat also omits that it has no plans to retire its old spacecraft or to aggressively reduce the inefficient global beam traffic that dominates its spectrum requirements. Moreover, Inmarsat makes the misleading claim that its new satellite is spectrum efficient because it has the capacity to operate with 200 narrow spot beams (*Inmarsat Nov. 16 Letter* at 8); in fact, the new satellite puts only 12

[1] *See* Letter from John Janka, Counsel for Inmarsat, to Ms. Marlene H. Dortch, FCC, File No. SAT-PPL-20050926-00184, IB Docket No. 05-220, IB Docket No. 05-221 (November 16, 2005) ("*Inmarsat Nov. 16 Letter*").

spot beams over the United States and coastal waters, at a look angle that is likely to significantly reduce their ability to deliver maximum power to these areas. *See* Exhibit 1.[2] In contrast, MSV's new, much higher-power satellites each will have roughly 280 spot beams over the United States and coastal waters, at a look angle that will permit delivery of maximum power. *See* Exhibit 2.[3] As a result, for the same amount of spectrum and providing the same services, MSV using its next-generation satellites will be able to deliver at least 20-30 times more satellite capacity to United States customers than Inmarsat using its new satellite.

Finally, Inmarsat blames MSV for unresolved international coordination issues in the L band (*Inmarsat Nov. 16 Letter* at 9). Inmarsat's argument ignores the many efforts MSV has initiated over recent years and months to negotiate a new coordination agreement with Inmarsat, even in the face of Inmarsat's failure to abide by earlier agreements by refusing to return spectrum that MSV loaned to it on a temporary basis. The record of those negotiations speaks for itself and demonstrates that MSV, not Inmarsat, has taken good faith steps to reach a coordination agreement that optimizes the use of the L band to offer advanced wireless communications services.

Very truly yours,



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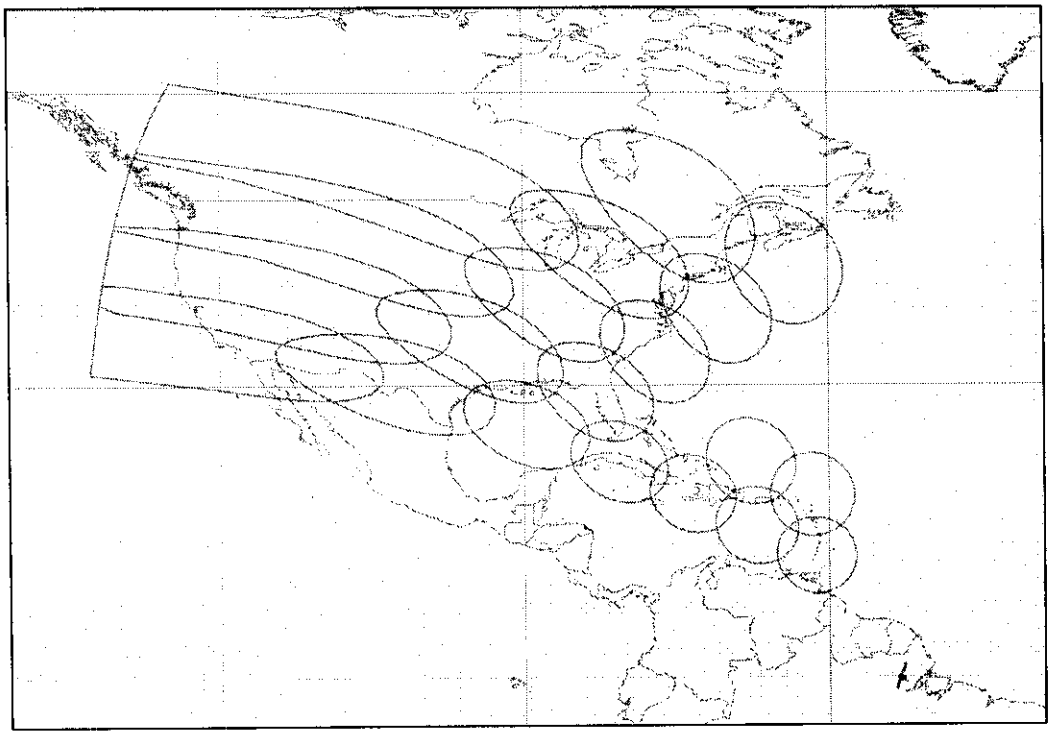
[2] Exhibit 1 is excerpted from a recent application to use Inmarsat 4F2 to provide BGAN service in the United States. *See* Stratos Communications, Inc., Application for Title III Blanket License, File No. SES-LFS-20050826-01175 (August 26, 2005), Attachment A at 6 (Figure A.3-1).

[3] Exhibit 2 is an illustrative depiction of the spot beam coverage area of MSV's next-generation satellites. While this Exhibit does not demonstrate actual beam deformation, it is an accurate representation of the number of beams each next-generation satellite will have over the service area of the United States.

cc: Chairman Kevin J. Martin
Commissioner Kathleen Q. Abernathy
Commissioner Michael J. Copps
Commissioner Jonathan S. Adelstein
Fred Campbell
Emily Willeford
John Branscome
John Giusti
Barry Ohlson
Donald Abelson
Gardner Foster
Anna Gomez
Karl Kensinger
Roderick Porter
Steve Spaeth
Cassandra Thomas

Exhibit 1

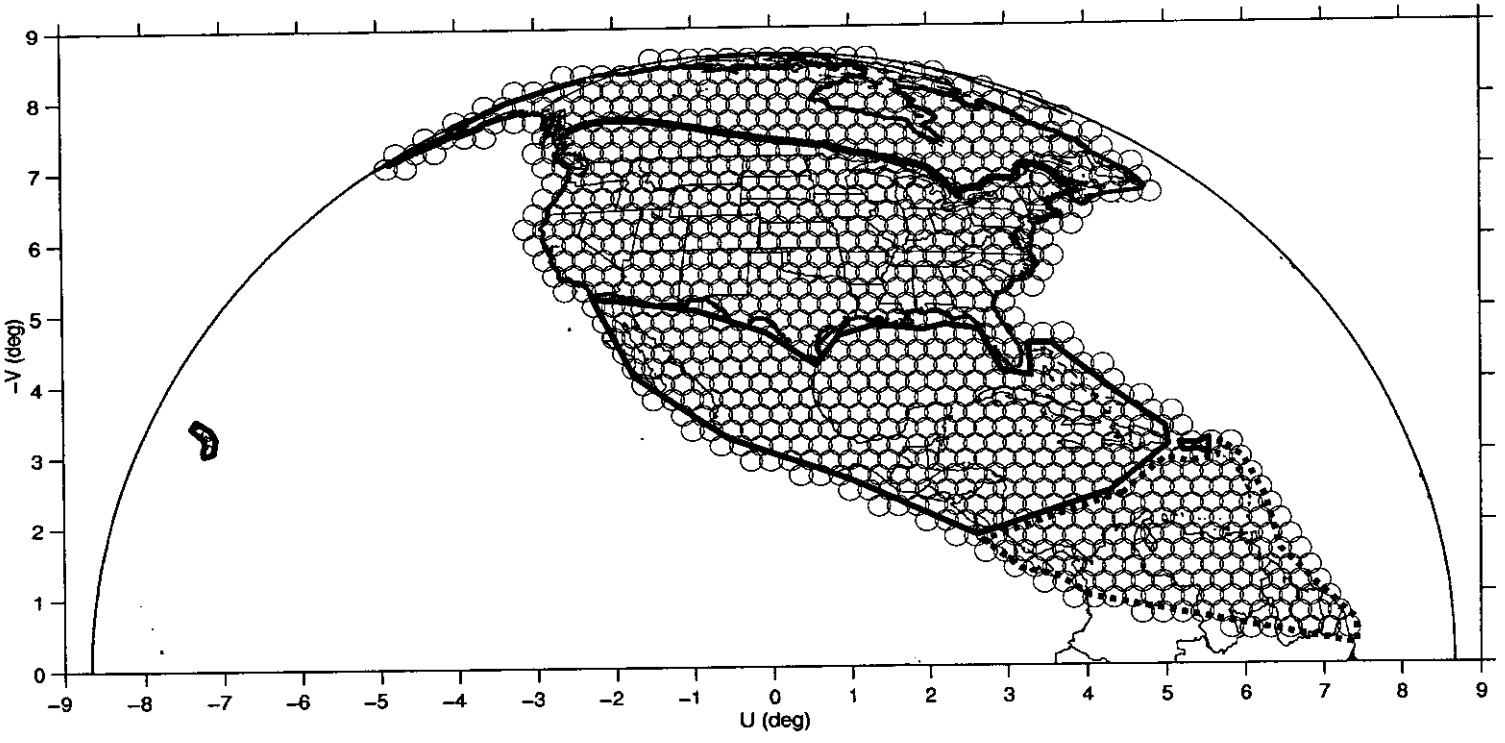
Figure A.3-1 – BGAN L-band service link spot beams covering U.S. territory



In addition to the service link beams, the BGAN User Terminals will also receive signaling communications in the L-Band via the global beam or the regional beams for the purpose of registering and unregistering communication sessions over the service link spot beams. The regional beams covering the U.S. territories in the satellite's coverage area are depicted in Figure A.3-2 below. The regional beam locations are nominally identical for both the uplink and downlink directions.

Exhibit 2

Proposed Next-Generation L Band Coverage



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